

FILED

NOV 07 2016

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY A. STEVENS,

Defendant.

Case No. **16 CR 134 CVE**

INDICTMENT

[COUNTS 1 through 10: 18 U.S.C. §

875(c): Interstate Communications

With Intent to Injure]

THE GRAND JURY CHARGES:

COUNTS ONE THROUGH TEN

[18 U.S.C. § 875(c)]

At all times relevant to this Indictment:

INTRODUCTION

1. On or about September 16, 2016, Tulsa Police Officer Betty Shelby shot and killed Terrance Crutcher, an adult black male and resident of Tulsa, Oklahoma. As a result, the Tulsa World, national news organizations, local news affiliates, and multiple social media outlets discussed, reported, and otherwise opined about the facts and circumstances surrounding the fatal shooting.

2. The Tulsa Police Department (TPD) maintained and operated a website, <https://www.tulsapolice.org>, that contained a link to TPD's Internal Affairs Investigations Division, <https://www.tulsapolice.org/content/tpd-citizen-complaint.aspx>, where a person could complete and file a citizen's complaint using an online form. That form provided a place to include information related to the complaint. Prior to submitting the citizen's complaint, notice was given by way of an attestation warning that stated "By clicking the

submit button I certify the statements in this form are true”.

THREATENING COMMUNICATIONS

3. On or about the dates stated in the table below, in the Northern District of Oklahoma, and elsewhere, the defendant, **JEFFREY A. STEVENS**, using the following Internet Protocol (I.P.) address: 208.103.77.58, transmitted communications in interstate commerce from the State of Connecticut to the State of Oklahoma that contained the threats as described in the table below to injure law enforcement, judges, and criminal justice officials and their immediate families, to wit, the defendant, utilizing the Citizen Complaint form at <https://www.tulsapolice.org/content/tpd-citizen-complaint.aspx>, transmitted the following threatening communications:


| COUNT | DATE | TIME | I.P. ADDRESS | THREAT |
|-------|-----------|------------|-----------------|---|
| ONE | 9/19/2016 | 6:18 p.m. | 208.103.77.58 | Threatened to injure by killing members of law enforcement |
| TWO | 9/20/2016 | 1:02 p.m. | 208.103.77.58 | Threatened to injure by executing and killing Tulsa Police Officer Betty Shelby, a Tulsa County District Judge, and prosecutors |
| THREE | 9/20/2016 | 4:28 p.m. | 208.103.77.58 | Threatened to injure by killing Tulsa Police Chief Chuck Jordan |
| FOUR | 9/22/2016 | 9:25 a.m. | 208.103.77.58 | Threatened to injure by killing Tulsa Police Officers, prosecutors, judges and their family members |
| FIVE | 9/22/2016 | 9:42 a.m. | 208.103.77.58 | Threatened to injure by killing members of Tulsa law enforcement, their families, wives, and children |
| SIX | 9/22/2016 | 10:01 a.m. | 208.103.77.58 | Threatened to injure by killing or burning to death a former Tulsa Police Chief and family |

| COUNT | DATE | TIME | I.P. ADDRESS | THREAT |
|-------|-----------|------------|-----------------|--|
| SEVEN | 9/22/2016 | 10:09 a.m. | 208.103.77.58 | Threatened to injure Tulsa Police Officers and their children |
| EIGHT | 9/22/2016 | 10:15 a.m. | 208.103.77.58 | Threatened to injure by killing Tulsa law enforcement and/or citizens and children |
| NINE | 9/22/2016 | 10:34 a.m. | 208.103.77.58 | Threatened to injure the children of Tulsa law enforcement |
| TEN | 9/22/2016 | 4:37 p.m. | 208.103.77.58 | Threatened to injure by killing Tulsa Police Officer Betty Shelby, and other Tulsa Police Officers |

All in violation of Title 18, United States Code, Section 875(c).

DANNY C. WILLIAMS, SR.
UNITED STATES ATTORNEY

A TRUE BILL


R. TRENT SHORES
Assistant United States Attorney

/s/ Grand Jury Foreperson
Grand Jury Foreperson